

EXHIBIT D

JJHCS INDEX IN SUPPORT OF MOTION TO SEAL
PORTIONS OF SAVEONSP'S MOTION TO COMPEL DOCUMENTS REGARDING THE MAY-NOT-USE PROVISION
(ECF NOS. 355, 377 & 387)

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing, if Any, and Basis
<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson regarding SaveOnSP's Motion to Compel JJHCS to produce documents regarding the May- Not-Use Provision, dated August 23, 2024 (ECF No. 355)</u>		JJHCS requests the redaction of information in and exhibits to the August 23 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	If filed on the public docket, these portions of the August 23 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information. Disclosure to the public of this confidential and proprietary	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Page 2, note 2	Redactions discussing confidential exhibits					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing, if Any, and Basis
Exhibit 2	Redactions to JJHCS's responses and objections to SaveOnSP's request for production of documents reflecting confidential business information and strategy		information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.			
Exhibit 3	Sealing of email attachment reflecting confidential business information and strategy					

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Exhibits 5 & 6	Redactions to discovery letters discussing confidential documents					
<u>Letter from Jeffrey J. Greenbaum to Judge Wolfson in opposition to SaveOnSP's motion to compel, dated September 10, 2024 (ECF No. 377)</u>		JJHCS requests the redaction of information in and exhibits to the September 10 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits	If filed on the public docket, these portions of the September 10 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is	None	None
Page 5	Redactions discussing confidential exhibits					

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Exhibit 1	Redactions to SaveOnSP's request for production of documents reflecting confidential business information	contain sensitive business information. .	Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	available or practicable.		
Exhibits 3 & 4	Sealing of presentations reflecting confidential business information.					
Exhibits 7, 8 & 9	Redactions to discovery letters discussing confidential documents					

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Page 3		JJHCS requests the redaction of information in and exhibits to the September 19 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	If filed on the public docket, these portions of the September 19 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information. Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
	Redaction discussing confidential exhibits					